

1 THE HONORABLE JAMES L. ROBART
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6 U.S. DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON

8 LEONARD A. LEMMON, on behalf of himself
9 and all others similarly situated,

10 Plaintiff,

11 vs.

12 EQUIFAX INFORMATION SERVICES LLC,

13 Defendant.

14 NO. 2:17-cv-01464 JLR

15 **STIPULATION AND [PROPOSED]
16 ORDER EXTENDING DEADLINES
17 RELATED TO CLASS
18 CERTIFICATION**

19 *JLR*

20 WHEREAS, on December 8, 2017, this Court Ordered that all discovery related to
21 class certification in this matter be completed by February 26, 2018, and that Plaintiff file his
22 motion for class certification on March 27, 2018. Dkt. No. 6;

23 WHEREAS, Plaintiff submits that, prior to moving for class certification in this matter,
24 he will need to conduct discovery regarding the allegations in Plaintiff's Complaint;
25 Defendant's affirmative defenses; matters of numerosity, typicality, and commonality of
26 Plaintiff's claims with respect to the class he seeks to represent and Plaintiff's adequacy to
27 serve as a representative of those classes; issues relating to certification of those classes; third-
party discovery regarding civil judgment records maintained in the State of Washington; and
testimony of any expert witnesses identified by the Parties, if any;

28 WHEREAS, Plaintiff believes that, in light of the complexity of the issues presented in
29 this case, discovery regarding class certification in this matter will require additional time
30 beyond that allowed by the Court's December 8, 2017 Order. Dkt. No. 6;

1 WHEREAS, determining the number of class members requires comparison of public
2 records of satisfied civil judgments with Defendant's records to determine whether Defendant
3 is accurately reporting the status of a civil judgment record in the State of Washington;

4 WHEREAS, Plaintiff anticipates taking substantial third-party discovery of data
5 maintained by clerks of court in the State of Washington, some of which are not maintained
6 electronically and may require subpoenas and physical document productions. Furthermore,
7 this third-party data will then need to be compared to data maintained by the Defendant;

8 WHEREAS, in the experience of counsel for the Plaintiff, based upon similar cases in
9 other states, this process can be highly time consuming;

10 WHEREAS, counsel for the Parties have conferred, and Defendant does not oppose the
11 relief sought;

12 WHEREAS, good cause therefore exists to extend the deadlines set by this Court for
13 discovery related to class certification and Plaintiff's class certification motion.

14 **I. STIPULATION**

15 NOW THEREFORE, Plaintiff moves for an Order resetting the deadlines related to
16 class certification in this matter as follows:

EVENT	CURRENT DATE	NEW DATE
Deadline to complete fact discovery related to class certification	February 26, 2018	May 4, 2018
Plaintiff's Motion for Class Certification	March 27, 2018	June 8, 2018
Defendant's Opposition to Class Certification		July 13, 2018
Plaintiff's Reply in Support of Class Certification		August 10, 2018

1 STIPULATED TO AND DATED this 12th day of January, 2018.

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II. ORDER

IT IS SO ORDERED this 16th day of January, 2018.

THE HONORABLE JAMES L. ROBART

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STIPULATION AND [PROPOSED] ORDER EXTENDING
DEADLINES RELATED TO CLASS CERTIFICATION - 4
Case No. 2:17-cv-01464-JLR

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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on January 12, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 12th day of January, 2018.
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